Pretreatment Permitting

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Required vs. Optional Changes

Required changes: We must do

Optional changes: At the discretion of POTW



1) Removal Credits

403.7(h)

Compensation for Overflow

Updated requirements POTWs must meet to adjust removal credits

Slug Control

2) Permits

403.8(f)(1)(iii)(B)(6)

Slug control requirements must be included in SIU Control Mechanisms (i.e., permits)



3) Evaluate

403.8(f)(2)(vi)

POTWs must evaluate SIUs as to the need for a Slug Control Plan or other actions at least one time



4) Notification

403.8(f)(2)(vi)

Any change at the facility which affects the potential for a slug discharge

EPA manual "Control of Slug Loadings" http://www.epa.gov/npdes/pubs/owm021.pdf



5) SNC - changes to Definitions

403.8(f)(2)(viii)(A, B, and C)

A – Chronic Violations

B – Technical Review Criteria Violations

C – Other Violations

Inclusion of BMPs

POTW Sampling

6) POTW performs sampling for SIUs 403.12(g)(2)

If a POTW performs sampling in lieu of SIU, POTW must repeat sampling and analysis within 30 days of becoming aware of an exceedance

SIU Compliance Reports

- 7) Periodic Compliance Reports 403.12(g)(3), (4), and (6)
- SIUs must report nature & concentration (2/yr)
- SIUs must report all sampling results
- POTW can determine number of grab samples

SIUs Sampling

8) SIUs must provide representative sampling

403.12(g)(3)

Monitoring Reports found in 403.12(b), (d), and (h)

Change in Discharge

9) Notification403.12(j)

Industrial Users shall promptly notify POTW and *Control Authority* of change in discharge

Signature Requirements

10) Duly Authorized Employee 403.12(l) and (m)

Changes numeric criteria for designating an appropriate "responsible corporate officer"

Required Changes - Summary

- 1. Removal Credits
- 2. Slug Control
- 3. SNC definition
- 4. SIU reports
- 5. POTW sampling of SIUs (violation occurs)
- 6. Permits
- 7. Duly Authorized Employee(s)
- 8. Grab Samples

Required POTW Modifications

- Modify Boiler Plate permits (Slug and BMP)
- Evaluate all SIUs within one year for slug potential
- Revise SNC definition in ERP to include BMPs
- Legal Authority re-evaluation
- Letter for "Duly Authorized Employee"

Optional Changes to 403

- 1) Sampling for Pollutants Not Present
- 2) General Control Mechanisms
- 3) Best Management Practices
- 4) Equivalent Concentration Limits
- 5) Equivalent Mass Limits
- 6) CIU Oversight (new subcategories)
- 7) Minor modifications

Sampling for Pollutants not Present

403.8(f)(2)(v) and 403.12(e)

- POTW can grant a waiver to CIU for specific pollutant
- POTW can reduce monitoring frequency
- Certification statement
- The option is yours

General Control Mechanisms

403.8(f)(1)(iii)

- Regulate a group of similar SIUs
- > IU must submit written request for coverage
- Clus with mass limits/production based/CWF NOT ALLOWED
- Public Notice the General Permit
- Annual Reports

Best Management Practices

403.3(e), 403.5, 403.8(f), 403.12(b), (e), and (h)

- Was no definition in 403
- > Summary:
- In lieu of local limits
- Enforceable
- Included in permits
- SNC to include BMPs

BMPs - cont.

BMPs need to include

- > In permits
- > Installation of treatment
- Requirements or prohibitions
- > 0 & M
- > Timeframes
- Other requirements as needed by POTW

Equivalent Concentration Limits

403.6(c)(9)

- Concentration based limits in lieu of mass based limits
- No dilution

Equivalent Mass Limits

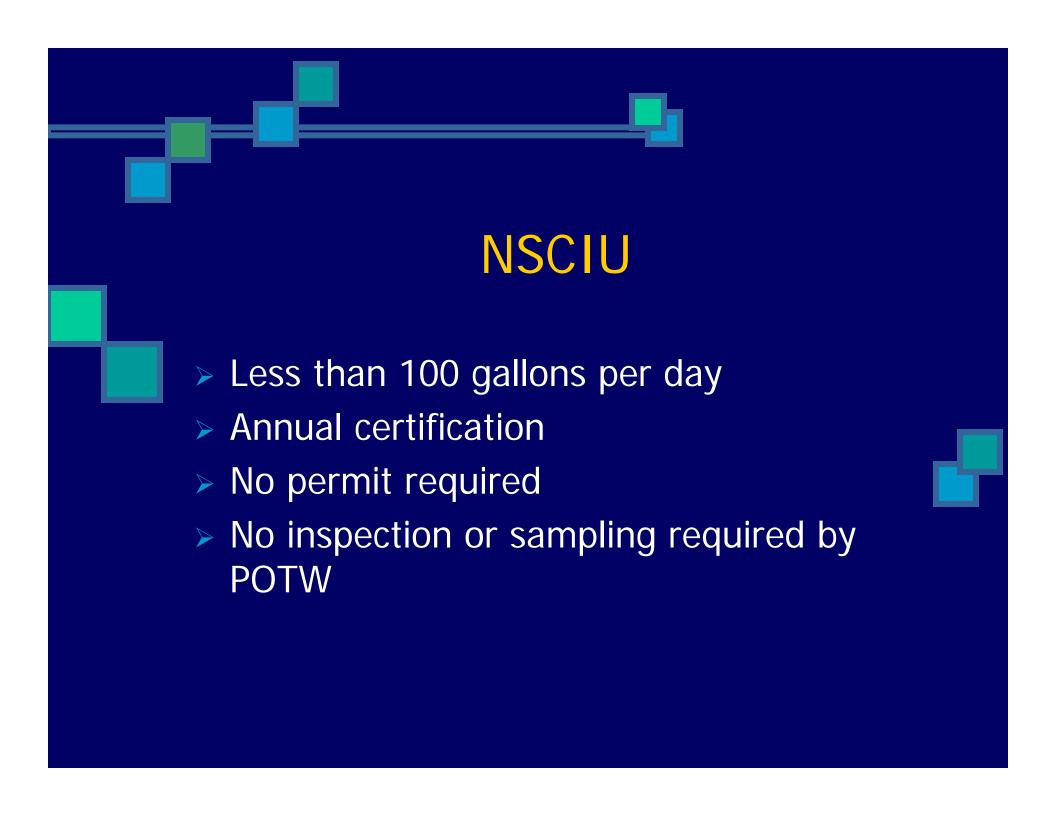
403.6(c)(5)

- Allows POTWs to convert standard
- CIUs must request (POTW can deny)
- Becomes new standard

CIU Oversight

403.3(n)(2), 403.8(f)(2)(v), 403.12(e), (g), (i) & (q), 403.8(f)(2)(v)(C), 403.12(e)(3) & (i)

- NSCIU (nonsignificant CIU)
- MTCIU (Middle Tier CIU)
- > All other CIUs



MTCIU

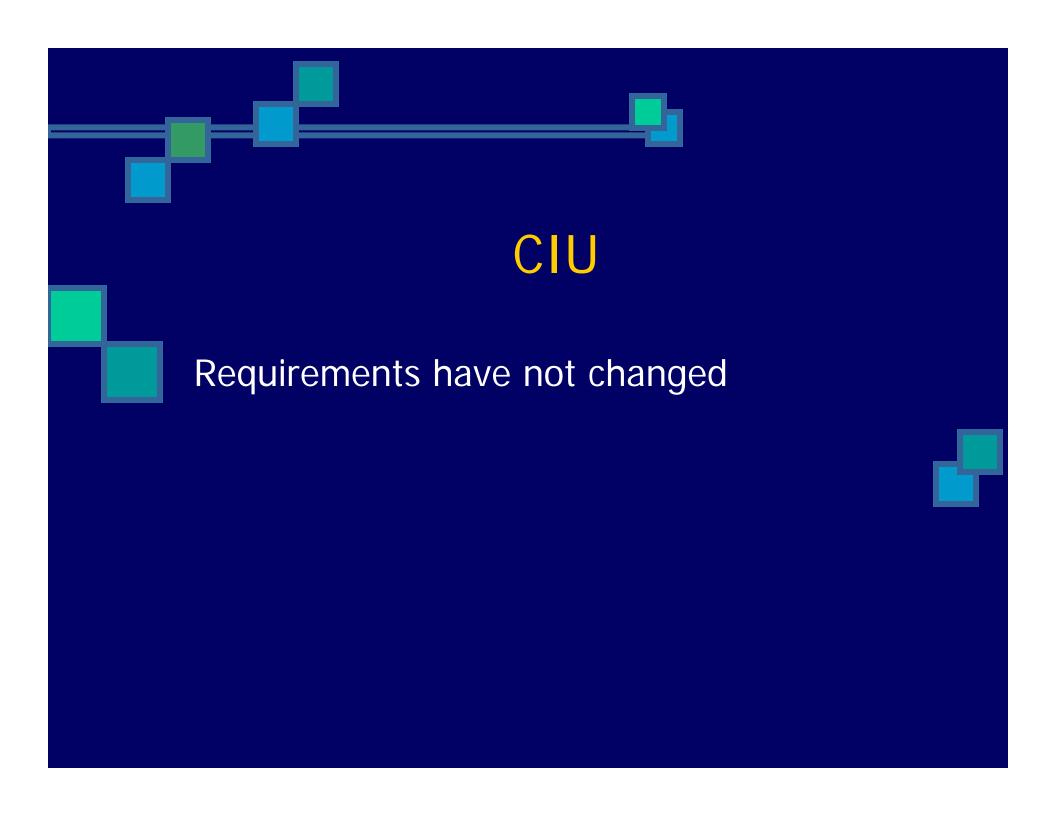
No more than 5000 gpd

or

0.01% of design dry weather hydraulic capacity 0.01% of design organic treatment capacity 0.01% of the MAHL



- Permit required
- Reduced sampling to 1/year
- Reduced POTW Inspections to 1/every 2 years



Minor Changes

- > SNC
 - 1) Publication
 - 2) Only SIUs
 - 3) Reports

What does all this mean to YOU ?????

Greater Flexibility in operating your pretreatment program

DocumentationKey to documentationDO IT and KEEP IT



Bureau of Water's Internet Website:

http://www.dhec.sc.gov/water/

■ EPA Pretreatment Homepage

http://cfpub2.epa.gov/npdes/

http://ecfr.gpoaccess.gov

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Questions ?????

